



ATTORNEY DOCKET: 47004.000073

PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application Of:

Robert J. ROSKO

Application Number: 09/599,602

Filed: June 23, 2000

For: System and Method for  
Implementing a Consolidated  
Application Process

Group Art Unit: 3624

Examiner: Geoffrey R. AKERS

Conf. No. 1459

**RECEIVED**

MAY 02 2003

**GROUP 3624**

**REQUEST FOR RECONSIDERATION UNDER 37 C.F.R. § 1.111**

Commissioner for Patents  
Washington, DC 20231

Sir:

This submission is responsive to the Office action mailed January 31, 2003 (hereinafter Office action). This submission is filed within the three month shortened statutory period for reply. Any fees that may be due but are not attached may be charged to Deposit Account No. 50-0206. The Office action sets forth the rejections detailed below regarding the above captioned application. Each rejection is addressed below. In view of the following remarks, applicant respectfully requests reconsideration and allowance of the instant application. Claims 1-19 remain pending in this application.

Summary of the Rejections

Claims 1-19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,438,594 issued to Michel K. Bowman-Amuah (hereinafter Bowman-Amuah) in view of U.S. Patent 6,298,356 issued to Janardhanan Jawahar and Venkatachari Dilip (hereinafter Jawahar) in view of U.S. Patent 6,493,677 issued to Ernest J. A. von Rosen and Vaclav Vincalek (hereinafter von Rosen) and further in view of U.S. Patent 6,202,054 issued to Matthew P.



21967

PATENT TRADEMARK OFFICE

Lawlor and Timothy E. Carmody (hereinafter Lawlor). The following remarks distinctly and specifically point out why the applied combination of references fails to render claims 1-19 obvious. Accordingly, applicant respectfully requests reconsideration of this application and withdrawal of the rejections based on this combination of references.

Bowman-Amuah is directed to a system and method for delivering a plurality of services through a global computer network by use of globally addressable interfaces and locally addressable interfaces. Great detail is included regarding the advantages of and methods for constructing component or object based large-scale Internet solutions for providing business services. However, Bowman-Amuah merely provides options and components for developing flexible computing solutions for providing any business service. Bowman-Amuah does not address the details for providing any particular service. Bowman-Amuah attempts to teach how to develop a component based Internet type business solution, rather than teaching a system or method that provides a particular service, such as accepting applications for banking products.

Jawahar is directed to methods and apparatus for enabling dynamic resource collaboration. The Jawahar system provides information to a provider of web pages regarding those who access the web pages. Jawahar, like Bowman-Amuah, does not address the specifics of providing any particular service through web pages. In the Jawahar system, a record of web pages viewed by a particular user is stored for reference by an agent, who may provide additional assistance to the user. Certain web pages accessed by the user may be cached to determine exactly what the user accessed. One use of retaining this record of a user's access is to provide further help to the user upon request. Thus when appropriate, a help button may be provided to user. If the user requires further assistance, upon clicking the help button, the agent may be

provided with the record of information accessed by the user. The agent may then provide further assistance. Accordingly, when the help button is selected, the system determines the types of web pages that have been viewed by the user and time spent viewing each type of page. The system further determines the product or services associated with web pages viewed by the user. Jawahar col. 17, ll. 37-46.

Von Rosen is directed to providing an internet site that allows a customer to create and order customized branded merchandize, such as bottles of soda. Von Rosen describes displaying only one order page upon selecting an order menu item. Von Rosen col. 9, ll. 37-41. The order page is not altered based on the type of product the user desires. There is no suggestion to assemble the order page from multiple documents related to different types of products. In fact, the von Rosen system gathers the same information for each and every transaction. Von Rosen col. 9, l. 41 - col. 10, l. 18. The order taking process is identical regardless of what type of products the user desires to order. Von Rosen col. 11, l. 62 - col. 12, l. 54, Figs. 13A - 13B.

Lawlor is directed to a system for providing electronic home banking and bill-paying services through ATM networks. The Lawlor system provides dedicated telephone-based banking terminals to users for home banking use. Lawlor col. 6, ll. 59-61. The terminal is designed to interact with users in a manner similar to ATM user interaction. Lawlor col. 8, ll. 1-2. Lawlor is silent regarding the application process for banking products and services and provides no application for requesting information to apply for such services.

Applicant's invention, as defined by the pending claims, is a method or system for providing a dynamically created application form through a network to a consumer applicant for one or more products. The invention is directed particularly to tailoring an application form to a

particular request from an applicant. Thus an applicant may apply for multiple requested products, such as banking products, by completing one application form tailored to the applicant's request. As an example, a potential applicant may chose from an array of products offered by a product provider, such as a bank. The potential applicant may request to apply for a checking account and a credit card account. The instant invention would then dynamically create an application form to solicit the information required to apply for both a checking account and a credit card. In this manner, the applicant provides the required information to the bank in one convenient action.

The applied references fail to show or suggest any system or method for applying for any product. Bowman-Amuah and Jawahar are rather directed to the features of Internet or Web based systems with broad application to various tasks. Von Rosen is directed to one specific product, personalized soda bottles, and thus does not tailor any application page to receive information required to apply for multiple products. Lawlor is directed to ATM terminals for conducting home banking actions through the phone system. The applied art does not address creating or assembling an application page related to a request to apply for selected products. Accordingly, the applied prior art fails to suggest the specific details of applicant's invention as set forth in the pending claims. The details of the features absent from the applied art are discussed further below.

#### Prior Response

The rejections set forth in the recent Office action are issued in response to applicants' Request for Reconsideration filed November 27, 2002, (2002 Response) which in turn was responsive to the Office action mailed August 27, 2002, (2002 Office action). The 2002 Office

action rejected claim 1-19 as being unpatentable over Bowman-Amuah in view of Jawahar. The 2002 Response set forth reasons why Bowman-Amuah in view of Jawahar fails to show or suggest all the limitations of the claimed invention. This rejection has apparently been withdrawn in the instant Office action, thus acknowledging the deficiencies of the combination of Bowman-Amuah in view of Jawahar. Two newly cited references are applied in an attempt to correct for the deficiencies of the previously applied references. The Examiner has considered applicants' arguments set forth in the 2002 Response but these arguments have been deemed moot in view of the new grounds of rejection. Applicants do not agree that the arguments in the 2002 Response are rendered moot.

In the 2002 Office action, Bowman-Amuah was relied upon to show the step, included in claims 1 and 14, of receiving a request to apply for a plurality of products. In the 2002 Response, applicant explained in detail that Bowman-Amuah fails to address receiving applications from consumers for products and thus cannot suggest receiving a request to apply for at least one product as set forth in claims 1 and 14. The recent Office action asserts, in identical language to the 2002 Office action, that Bowman-Amuah teaches receiving a network request to apply for a plurality of products. Yet the Office action is silent with regard to applicant's arguments explaining why Bowman-Amuah fails to show or suggest such a step. Accordingly, applicants respectfully assert that the reasons presented in the 2002 response demonstrating that Bowman-Amuah fails to teach a method for dynamically creating a network application form comprising receiving a network request to apply for a plurality of products where specific information is required to apply for the products are not moot in view of the new grounds of rejection.

Similarly, Jawahar continues to be relied upon to show a document containing at least one field related to information required to make an application, data validation and dynamically generated pages containing critical information, determining whether a request to apply originates from a customer logged into a session manager, banking products and information required to apply for an amount of credit, a request in the form of parameters received with a URL, and a universal session manager that is in communication with a dynamic application module for creating a verification of the originator of a request. Applicants have addressed the failure of Jawahar to show or suggest these features in the 2002 Response.

“Where the applicant traverses any rejection, the examiner should, if he or she repeats the rejection, take note of the applicants’ argument and answer the substance of it.” M.P.E.P. § 707.07(f) (8<sup>th</sup> Ed. 2001). Applicants respectfully request that the Office answer the substance of his argument with regard to the failure of Bowman-Amuah and Jawahar to show or suggest the above features.

#### Claim 1

Claim 1 sets forth a method for dynamically creating an application form. The method includes steps of receiving a request to apply for a plurality of products, assembling an application page from a plurality of documents each of which contains a field corresponding to specific information required to apply for a product, and receiving information corresponding to each field in the application page. The instant specification describes a particular preferred embodiment of the claimed invention. In this embodiment, an Internet banking services provider receives a potential customer’s request to apply for products such as a checking account and a credit card account offered by the provider. An application page is assembled and provided to

the customer. The application page requests only information required to apply for both the checking account and the credit card. The customer may then complete the application through the application page provided and cause the completed application to be sent to the provider. The applied combination of references fails to show or suggest the steps set forth in claim 1.

The applied art of Bowman-Amuah in view of Jawahar, von Rosen, and Lawlor fails to show or suggest a step of receiving a request to apply for a plurality of products. The Office action states Bowman-Amuah teaches “receiving a network request to apply for a plurality of products where specific information is required to apply for the products(Fig 9/902).” No support is provided for this assertion in the Office action. The Office action provides no explanation regarding why Bowman-Amuah, with particular reference to the Business Imperatives 902 set forth in Figure 9, would suggest a step of receiving a request to apply for a plurality of products as set for in claim 1. Bowman-Amuah does not show or suggest a step of receiving a request to apply for a plurality of products. To the contrary, Figure 9 of Bowman-Amuah suggests the circumstances in which Host technology generation should be considered as the type of architecture to address a particular business’ needs. Bowman-Amuah fails to address in any manner any particular computer system that receives applications from consumers for products, such as applications for banking products. Figure 9 of Bowman-Amuah does not use the term “application” to refer to a form used to apply for a product, but rather uses the term “application” to refer to a computer system having a particular use. Figure 9 of Bowman-Amuah broadly categorizes the requirements of a business client for selecting server architecture. In contrast, claim 1 sets forth a particular consumer application for particular products provided by a business. Bowman-Amuah simply does not address any method for applying for any product

and thus fails to suggest a step of receiving a request to apply for a plurality of products as set forth in claim 1.

The applied art fails to show or suggest a step of assembling an application page for display over a network, where the page is assembled from a plurality of documents. In the Office action, it is acknowledged that Bowman-Amuah does not teach this step; rather the reference to von Rosen is relied upon to show this step. The Office action states: “Von Rosen teaches assembling an application page for display over a network for products or services (Fig 2)(Abstract)(Fig 8A)(Fig 8B) assembled from a plurality of documents.” There is no explanation in the Office action setting forth the relevance of Figure 2 to the step of assembling an application page. The abstract of Von Rosen is directed to one method and apparatus for creating and ordering customized branded merchandize over a computer network. The abstract does not suggest assembling an application page assembled from a plurality of documents. Figures 8A and B illustrate windows produced by a WWW browser installed on a client computer browsing a WWW site embodying aspects of the Von Rosen system. Von Rosen states: “If the consumer selects the order menu item 180 from the menu 168, an order WWW page 178 will be displayed on WWW browser 118 as shown in FIGS. 8A and 8B.” Von Rosen, col. 9, ll. 37-39. Von Rosen does not suggest that the order page 178 is assembled from a plurality of documents. Furthermore, as apparently acknowledged in the Office action, Von Rosen suggests no documents that contain fields corresponding to the specific information required to apply for one of the plurality of products as set forth by claim 1. Von Rosen fails to show or suggest assembling an application page for display over a network, where the page is assembled from a plurality of documents as set forth by claim 1.



Von Rosen cannot properly be combined with Bowman-Amuah. There is no explanation in the Office action regarding how any application page allegedly taught by Von Rosen could be combined with the Bowman-Amuah system and method for delivering a plurality of services through a global computer network by use of globally addressable interfaces and locally addressable interfaces. There is no explanation how the Bowman-Amuah system could be modified using any teaching from von Rosen. There is no suggestion that any specific page suggested by von Rosen would have any applicability in the Bowman-Amuah system.

There is no motivation to combine the teachings of von Rosen and Bowman-Amuah as suggested in the Office action. The Office action states: "The motivation to combine is to teach an apparatus for creating and ordering merchandise over a network as enunciated by von Rosen(col 1 line 64-col 2 line 12) at a website." This statement is merely a motivation to develop the von Rosen system, as von Rosen itself is directed to providing a method and apparatus for creating and ordering merchandise over a computer network. The Office action fails to state a motivation to then combine the teaching of von Rosen with Bowman-Amuah. There is no suggestion in the applied art to combine the apparatus for creating and ordering merchandise of von Rosen with a system for delivering a plurality of services by using globally addressable interfaces and locally addressable interfaces such as the Bowman-Amuah system.

Claim 1 further sets forth that the application page is assembled from documents, wherein each document contains at least one field corresponding to information required to apply for a product. In the Office action it is apparently recognized that neither Bowman-Amuah nor von Rosen show or suggest this limitation. Jawahar is applied to show this limitation. The Office action states: "Jawahar teaches whereby each document contains at least one field in the

document containing one field related to information required to make an application (Fig 3/118/94/92/90/114/116/120)(Fig 5)(Fig 6)((Fig 8)(Fig 9/274)(Fig 10).” The Office action includes no support for this statement. Applicant respectfully submits that Jawahar does not show or suggest a plurality of documents wherein each document contains at least one field corresponding to the specific information required to apply for one of the plurality of products. None of the figures cited in the Office action suggest any field associated with applying for any product. As discussed above, the contents of the web pages viewed by the user (specifically with regard to any product or services presented) is recorded by the Jawahar system. However, no documents are suggested that contain any field corresponding to specific information required to apply for any of the presented products.

Figure 3 of Jawahar illustrates a control server including video transaction manager 118, video server 94, fax server 92, e-mail server 80, e-mail transaction manager 114, fax transaction manager 116, and transaction processing system manager 120. Figure 5 is a flow diagram illustrating a procedure for communicating information between various devices. Figure 6 illustrates various windows displayed to an agent using the agent’s computer. Figure 8 is a flow diagram illustrating a procedure for determining whether to display a “Help” button to a user. Figure 9 is a flow diagram illustrating a procedure for selecting an agent to provide help to a user. Figure 9 includes step 274 for determining product(s) or service(s) associated with the web pages viewed by the user. Figure 10 illustrates a table containing information relating to web pages accessed by a user. The Office action includes no explanation how any of these figures would suggest to one of ordinary skill a plurality of documents wherein each document contains at least one field corresponding to specific information required to apply for one of a plurality of

products. To the contrary, Figures 9 and 10 demonstrates that each page of the Jawahar system describes aspects of a single product. There is no suggestion that any of these pages includes a field corresponding to information required to apply for a product. Accordingly, Jawahar does not teach a plurality of documents, each with a field corresponding to information required to apply for a product as set forth by claim 1.

Jawahar cannot be properly combined with Bowman-Amuah and von Rosen. There is no explanation in the Office action regarding how any document allegedly taught by Jawahar could be combined with the Bowman-Amuah system and method for delivering a plurality of services through a global computer network by use of globally addressable interfaces and locally addressable interfaces. There is no explanation how the Bowman-Amuah system could be modified using any teaching from Jawahar. There is no suggestion that any specific page suggested by Jawahar would have any applicability in the Bowman-Amuah system.

Furthermore, the application page, allegedly taught by von Rosen, is assembled from a plurality of documents, allegedly taught by Jawahar. There is no suggestion how the order page of von Rosen could be modified using any pages from the Jawahar system or the data regarding products or services collected by the Jawahar system. There is no suggestion to include multiple pages directed to different products in von Rosen. Even should one modify the von Rosen system to include multiple order pages directed to different products, there is no suggestion how such pages would use the information collected by the Jawahar system.

There is no motivation to combine the teachings of Jawahar and Bowman-Amuah as suggested in the Office action. The Office action states: "The motivation to combine is to teach the search of static and dynamically generated web pages having information on them with

respect to products or services (col 16 lines 59-63)being accessed by a web server with respect to information gathered and resources spent on the search of these pages as enunciated by Jawahar (col 1 line 59-col 2 line 4).” First, the applied art does not teach the search of static and dynamically generated web pages. In the Jawahar system, non-displayable information embedded in tagged web pages is logged. Jawahar col. 14, l. 56 - col. 15, l. 15. Second, there is no suggestion in the applied art that the information as logged by Jawahar would have any use in the systems of Bowman-Amuah or von Rosen. That Jawahar teaches gathering information on viewed web pages is not itself motivation to use such information in the systems of Bowman-Amuah or von Rosen.

The applied art also does not suggest the step of receiving information input corresponding to each field contained in the application page as set forth by claim 1. In the Office, action the Summary of the Invention of Jawahar is relied upon to show this step of receiving. The Office asserts that Jawahar teaches, “receiving information input corresponding to each field contained in each application page(col 2 lines 6-59).” However, the Summary in Jawahar includes no suggestion of receiving any information required to apply for any product. The summary merely addresses receiving requests to view web pages from a user. There is no suggestion that these requests include any information input that corresponds to fields of an application page as set forth by claim 1.

Applicants note that the rejections of claims 1, 8, and 14 are set forth in paragraph 6 of the Office action. Although the remaining applied reference to Lawlor is discussed in paragraph 6, Lawlor is not applied to teach any limitation of claim 1.

For at least the above reasons, Bowman-Amuah in view of Jawahar, von Rosen, and Lawlor does not show or suggest the steps of the invention defined by claim 1. Not one of these references addresses receiving a request to apply for a product, assembling an application page, or receiving information corresponding to the application page. Applicant, therefore, respectfully requests that this rejection of claim 1 be withdrawn.

Claims 2-7 dependent from Claim 1

Claim 2-7 depend from claim 1 and therefore include each step of the method of claim 1. Applicant respectfully submits that the applied references do not show or suggest each step of the method set forth in claims 2-7 for at least the reasons set forth above with respect to independent claim 1. Further significant defects of the applied references as applied to claims 2-7 are discussed below.

Claim 2 further sets forth validating the information input, if the validation is not correct a second application page is assembled including prompts to reenter information. The secondary reference to Jawahar is relied upon to show the steps set forth in claim 2, as it is acknowledged in the Office action that the primary reference does not teach data validation. The Office action states: "Jawahar teaches data validation and dynamically generated pages containing critical information(col 18 lines 28-col 9 line 2)(col 6 lines 40-58)(col 13 lines 29-31)(col 20 lines 34-44)." This statement is insufficient to demonstrate that the additional steps of claim 2 are suggested by Jawahar. First, the mere explanation of dynamically generated pages in Jawahar is insufficient to teach the details of the presently claimed invention. The present invention includes assembling *an application page* and validating information input received that corresponds to the fields of the application page. Jawahar fails to suggest dynamic web pages

that include fields corresponding to information needed *to apply* for more than one product.

Second, although various citations to Jawahar are provided in the Office action, none of the cited passages address validation as set forth in claim 2. Jawahar does not suggest comparing data received to validation criteria and assembling a second application page if the validation is not correct as set forth in claim 2. Furthermore, there is no motivation to combine the teachings of Jawahar and Bowman-Amuah for the reasons discussed above with respect to claim 1.

Claim 3 includes the step of forwarding the information input to a decision module for processing the information input. In the Office action, it is acknowledged that Bowman-Amuah does not teach this step. It is asserted: “Lawlor teaches this(Fig 1A/80/80D).” Figure 1A of Lawlor is a block diagram of a CPU in a financial distribution system. Figure 1A illustrates that the CPU 80 includes an authorization module 80D. The Office action includes no explanation how the authorization module of Lawlor could be used in the Bowman-Amuah system and method for delivering a plurality of services or with the systems of Jawahar or von Rosen. There is no motivation found in the prior art to combine these references. In the Office action it is asserted: “The motivation to combine is to teach an apparatus for delivering banking and other financial services to customer homes and offices over a network as enunciated by Lawlor.” Although Lawlor is directed to delivering banking services to customer’s homes, there is no suggestion that such services are useful within the systems of Bowman-Amuah, Jawahar, and von Rosen. In fact, Lawlor specifically teaches away from any combination with the personal computer based systems of Jawahar and von Rosen. Lawlor specifically provides an ATM based system that does not use a personal computer. Lawlor col. 2, ll. 47-50, col. 6, ll. 32-41. Lawlor

specifically teaches away from the use of personal computers to deliver banking services and thus teaches away from any combination with the Jawahar and von Rosen systems.

Claim 4 includes the step of determining whether the request to apply originates from a customer that is logged in to a session manger, accessing stored data regarding the customer if the customer is logged in, and inserting the stored data in the application page. The steps of claim 4 permit the claimed system to use secure information regarding a customer to prefill fields in an application form for a product when information required to apply for the product is already known to the product provider. In the Office action, it is acknowledged that Bowman-Amuah does not teach this step. It is asserted, “Jawahar teaches this(Fig 3/102/120)(Fig 11/400)(Fig 13/610)(Fig 14).” Figure 3 of Jawahar illustrates a control server including a transaction host 102 and a transaction processing system 120. The transaction host 102 manages interaction between an agent and a customer. Jawahar, col. 10, ll. 9-18. There is no suggestion that the transaction host or transaction processing system determines whether a customer is logged in or inserts stored data in an application page. Figures 11, 13, and 14 are flowcharts of the Jawahar system, which illustrate that a session between a customer and an agent is established. There is no suggestion that this session includes determining whether a customer is logged in or inserting stored data in an application page. Jawahar shows that a user (first client) and agent (second client) can be connected though a joint session in which the server may duplicate what is presented to the user and the agent. Jawahar col. 8 ll. 26-40. In this manner the agent may view the resources viewed by the user and the agent may provide resources to the user. However, there is no suggestion that stored data regarding a customer is inserted in an application page for applying for products as set forth by claim 4. Furthermore, there is no

suggestion to combine the Jawahar with Bowman-Amuah for the reasons discussed with respect to claim 1.

Claim 5 sets forth that the plurality of products applied for includes banking products and the information required to apply for one of the products includes information regarding an amount of credit to be extended. Jawahar discusses uniform resource locator (URL) sharing as a method of providing user information to an agent. As an example of where URL sharing is inappropriate, Jawahar mentions banking transactions. Jawahar col. 19, ll. 27-46. Jawahar describes that in online banking transactions the customer's account number and transaction request information may be embedded in the URL. If the agent in this example were to access the same URL, the agent could improperly execute the banking transaction. Jawahar notes that online banking transactions may result in a withdrawal, transfer, or deposit. Significantly, Jawahar does not discuss applying for a bank account. In the transactions noted by Jawahar, the customer has already established an account with the banking services provider and has an account number. Accordingly, Jawahar includes no suggestion of any assembly of a page to apply for the bank account or other product. More specifically, there is no suggestion in Jawahar of an application page that contains a field corresponding to information regarding an amount of credit to be extended to the customer as specifically set forth in claim 5. There is also no motivation found in the prior art to combine the teaching of Jawahar with the teaching of Bowman-Amuah for the reasons discussed above. Jawahar teaches away from combining any teaching of URL sharing with banking transaction systems.

Claim 6 depends from claim 5 and further sets forth forwarding the information input to a decision module for processing to determine if data input justifies extension of credit. The



Office action asserts: "Lawlor teaches this(Figs 12-17)." Lawlor is directed to ATM type transactions using a home terminal. There is no suggestion that the Lawlor system processes input information to determine if the extension of credit is justified. The Lawlor system does not address the process of applying for the account accessed through the ATM system. Furthermore, as discussed above there is no motivation found in the prior art to combine Lawlor with the other applied references for the reasons discussed above with respect to claim 3.

Claim 7 sets forth that the request is in the form of parameters received within a universal resource locator. Jawahar is relied upon to show this limitation. Jawahar shows the use of URLs and modified URLs for requesting information from a server, as is the function of a URL. However, Jawahar does not suggest that any URL is a request to apply for products, as is the request set forth in claim 1. Furthermore, there is no motivation found in the prior art to combine the teachings of Bowman-Amuah and Jawahar for the reasons discussed above with respect to claims 1 and 5.

For at least the reasons set forth with respect to claim 1 and the further specific reasons set forth above, Bowman-Amuah in view of Jawahar, von Rosen and Lawlor does not show or suggest the steps of the invention defined by dependent claims 2-7. Applicant respectfully requests that the rejection of claims 2-7 over Bowman-Amuah in view of Jawahar, von Rosen and Lawlor be withdrawn.

#### Claim 8

Claim 8 sets forth a system for obtaining application data from an applicant through a dynamically created application form. The claimed system includes a dynamic application module and a decision module. The dynamic application module receives requests to apply for

at least one of a plurality of products, dynamically creates an application requesting data required to apply for the requested products, and receives the requested data. The decision module receives the data, generates a decision regarding the application, and provides the decision to the dynamic application module. Claim 8 is rejected on the same grounds as claim 1. The applied references do not show or suggest the system of claim 8 for reasons similar to those discussed above with respect to claim 1. Claim 8 is directed to a system for creating and processing applications for products, such as bank account or credit card accounts. The applied art fails to describe any system in which a consumer applies for any product such as a bank account or credit card.

In the Office action, it is asserted that Lawlor teaches a decision module in communication with a dynamic application module. Lawlor is directed to remote delivery of banking services through a dedicated terminal. This terminal is used to pay all bills, transfer funds, obtain balance information, look forward and backward at statement activity, transfer funds among accounts and banks, and obtain information on bank services and rates. Lawlor col. 10, ll. 8-13. There is no suggestion that terminal is used to apply for any bank account or service. Accordingly, there is no suggestion of a module for receiving a request to apply for a product and no suggestion to create an application requesting data to apply for the product as set forth in claim 8. Similarly, there is no suggestion of a decision module for generating a decision regarding the application as set forth in claim 8. As discussed in detail above with respect to claim 1, the applied references simply do not suggest a system for receiving or processing any request to apply or application for any consumer products, such as banking products.

There is no motivation found in the prior art to combine the applied references. In the Office action it is asserted: "The motivation to combine is to teach an apparatus for delivering banking and other financial services to customer homes and offices over a network as enunciated by Lawlor." There is no suggestion that banking services of Lawlor are useful within the systems of Bowman-Amuah, Jawahar, and von Rosen. In fact, Lawlor specifically teaches away from any combination with the personal computer based systems of Jawahar and von Rosen. Lawlor specifically provides an ATM based system that does use a personal computer. Lawlor col. 2, ll. 47-50, col. 6, ll. 32-41. Lawlor expressly teaches away from the use of personal computers to deliver banking services and teaches away from using the Jawahar and von Rosen systems.

For at least the reasons set forth above, Bowman-Amuah in view of Jawahar, von Rosen, and Lawlor does not show or suggest the components of the system defined by claim 8. Applicant respectfully requests that this rejection of claim 8 be withdrawn.

Claims 9-13 dependent from Claim 8

Claim 9-13 depend from claim 8 and therefore include each limitation of the system of claim 8. Applicant respectfully submits that the applied references do not show or suggest each limitation of the system set forth in claims 9-13 for at least the reasons set forth above with respect to independent claim 8. Further significant defects of the applied references as applied to claims 9-13 are discussed below.

Claim 9 further sets forth that the system includes a universal session manager and a profile database. The universal session manager verifies the originator of the request received by the dynamic application module. The profile database provides stored data regarding the

originator of the request. Jawahar is relied upon to show these features. Jawahar describes that an application server may retrieve information about a customer from a database. The information is then provided to an agent application for display on an agent computer system. However, Jawahar includes no suggestion that the application server, or any other server, verifies the originator of a request, as does the universal session manager set forth in claim 9.

Claim 12 further sets forth that the dynamic application module provides the application in the form of an application page over the network to the originator of the request. In the Office action it is asserted: "Von Rosen teaches this(Fig 6-9)." Figures 6-9 of von Rosen illustrate various windows produced by a WWW browser on a client computer browsing a WWW site of the von Rosen system. There is no suggestion that the web pages for receiving an order for personalized branded merchandize would have any applicability to the home banking system of Lawlor relied upon to show an application module. To the contrary, as discussed above, Lawlor expressly teaches away from a system that uses a personal computer. Accordingly, the applied art teaches away from using web pages of von Rosen to conduct the home banking services of Lawlor.

#### Claim 14

Claim 14 defines a method for dynamically creating an application form in a manner similar to claim 1. Claim 14 further sets forth that the request to apply for at least one of a plurality of products is in the form of a uniform resource locator. Claim 14 includes the step of parsing the uniform resource locator to identify the product. Claim 14 also includes all the steps and limitations discussed above with respect to claim 1. Claim 14 is rejected for the same reasons as claim 1. Accordingly, the applied prior art does not show the method of claim 14 for

at least the reasons discussed above with respect to claim 1. Additionally, there is no suggestion in the applied art of a request to apply for at least one of a plurality of products that is in the form of a uniform resource locator as set forth in claim 14. Applicants respectfully request the withdrawal of the rejection of claim 14 over Bowman-Amuah in view of Jawahar, von Rosen, and Lawlor as these references fail to render claim 14 obvious for at least the above reasons.

Claims 15-19 dependent from Claim 14

Claims 15-19 are identical to claims 2-6 but for depending from claim 14. Claims 15-19 are rejected for the same reasons as claims 2-6. Bowman-Amuah in view of Jawahar, von Rosen, and Lawlor does not show or suggest the invention as defined by claims 15-19 for at least the reasons discussed above with respect to claim 14 and claims 2-6. Applicant respectfully request that this rejection of claims 15-19 be withdrawn.

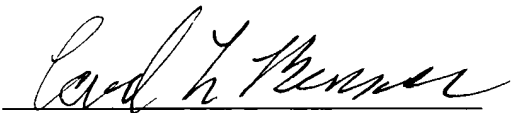
Conclusion

Applicant has replied to every rejection set forth in the outstanding Office action in the above remarks. Each rejection has been shown deficient or overcome for the reasons set forth above. No applied reference is directed to receiving a request to apply for a product or assembling an application for requesting data required to apply for the product. Accordingly, applicant submits that pending claims 1-19 are patentably distinguishable over the prior art of record. Reconsideration and early allowance of this application are respectfully requested. Should the Examiner require resolution of any issues for allowance, the Examiner is invited to contact the undersigned to expedite the prosecution of this application.

Dated: April 30, 2003

Respectfully submitted,

HUNTON & WILLIAMS

By: 

Carl L. Benson  
Registration No. 38,378

Intellectual Property Department  
1900 K Street, N.W.  
Suite 1200  
Washington, DC 20006-1109  
(202) 955-1500 (telephone)  
(202) 778-2201 (facsimile)